

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Federal Insurance Co., et al. v. al Qaida, et al., Case No. 03-CV-06978

Ashton et al. v. al Qaeda Islamic Army, et al., Case No. 02-CV-06977

**FEDERAL INSURANCE AND ASHTON PLAINTIFFS' JOINT MOTION FOR ENTRY
OF DEFAULT JUDGMENT AS TO LIABILITY AGAINST DEFENDANT, THE
ISLAMIC REPUBLIC OF IRAN, PURSUANT TO 28 U.S.C. § 1605A**

PLEASE TAKE NOTICE that upon the supporting Memorandum of Law and exhibits thereto, the *Federal Insurance* Plaintiffs, by and through their counsel, Cozen O'Connor, and the *Ashton* Plaintiffs, by and through their counsel, Kreindler & Kreindler, LLP, will move the Court before the Honorable George B. Daniels, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting Plaintiffs' motion for entry of default judgment against defendant, the Islamic Republic of Iran ("Iran"), pursuant to 28 U.S.C. § 1605A.

Respectfully submitted,

COZEN O'CONNOR

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